

JUDD BURSTEIN, P.C.  
ATTORNEYS AT LAW

JUDD BURSTEIN\*  
PETER B. SCHALK\*\*

G. WILLIAM BARTHOLOMEW\*\*  
ALI R. JAFFERY\*\*

\*ALSO ADMITTED IN CONNECTICUT  
\*\*ALSO ADMITTED IN NEW JERSEY

5 COLUMBUS CIRCLE  
1790 BROADWAY  
NEW YORK, NEW YORK 10019  
TEL: (212) 974-2400  
FAX: (212) 974-2944  
WWW.BURLAW.COM

12 OLD HILL FARMS ROAD  
WESTPORT, CONNECTICUT 06880  
TEL: (203) 226-4823

August 4, 2017

**VIA HAND DELIVERY and EMAIL – FILED UNDER SEAL**

The Honorable Katherine B. Forrest  
United States District Judge  
Southern District of New York  
500 Pearl Street, Room 2230  
New York, NY 10007  
ForrestNYSDCambers@nysd.uscourts.gov

Re: Krechmer v. Tantaros, et al., Docket No. 16-cv-7820

Dear Judge Forrest:

I write in connection with Your Honor's Order of July 31, 2017, authorizing redactions to certain documents submitted in this case which will be unsealed imminently. Accompanying the emailed version of this letter as PDF files are redacted versions of the submissions in this case that we believe comport with Your Honor's ruling. Because of the size of the submissions, we are sending them in two emails. In addition to providing these redacted submissions by email, for the Court's convenience, we are providing a disc containing these same submissions with the hand-delivered version of this letter.

In terms of procedure, we were informed by Roseanne from the Sealed Records Department that she will not be unsealing the Docket herself. Rather, Roseanne advised that she will await the receipt of the documents to be included in the Docket from Your Honor's Chambers. Therefore, in an effort to facilitate the process, we have included what we believe to be all appropriately redacted documents for entry on the public Docket.

Especially in light of the absence of a currently accessible Docket, it was an onerous process to review all submissions in this case and identify all of the necessary redactions. My office finished that process this morning, and provided proposed redactions to opposing counsel earlier today. Under the circumstances, we acknowledge that our adversary will need additional time to review our proposed redactions. Nonetheless, we are providing you with them now so as to comply with

JUDD BURSTEIN, P. C.

The Honorable Katherine B. Forrest  
August 4, 2017  
Page 2

the Court's deadline. We have no objection to the counsel for Plaintiff having sufficient time to provide comments to this submission.

Respectfully submitted.

Judd Burstein

Encls.

cc: Jay M. Wolman, Esq. (via email w/ encls.)